

JPN

M-10-058

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

ERNEST AMPONSAH,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

GERARD MCMAHON, being duly sworn, deposes and states that he is a Special Agent with United States Immigration and Customs Enforcement, Department of Homeland Security, duly appointed according to law and acting as such.

Upon information and belief, on or about January 15, 2010, within the Eastern District of New York and elsewhere, defendant ERNEST AMPONSAH did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant

1. On January 15, 2010, the defendant ERNEST AMPONSAH arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Air Morocco Flight No. AT 200 from Morocco.

2. Upon arrival at JFK, the defendant ERNEST AMPONSAH was selected at random for a secondary inspection by Customs and Border Protection ("CBP") officers. During the secondary inspection, the defendant stated, in sum and substance, that he was returning to the United States from Ghana, where he had been visiting family for the past two months. During the inspection, the defendant claimed ownership over the two suitcases that he was carrying and stated, in sum and substance, that he packed the suitcases himself. CBP officers then examined the two suitcases.

3. During their examination of the suitcases, the CBP officers removed the contents of one the suitcases, a black American Tourister suitcase. The CBP officers subsequently noticed that the empty American Tourister suitcase was unusually heavy. The officers also noticed that the bottom of the suitcase seemed thick. An x-ray of the American Tourister suitcase revealed three masses within the bottom lining of the suitcase. The CBP officers subsequently removed the lining of the bottom of the suitcase and noticed a large mass of a brown substance. This substance field-tested positive for heroin.

facts and circumstances of which I am aware.

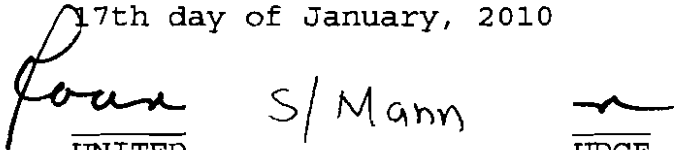
4. The total approximate gross weight of heroin recovered was 6745.6 grams.

WHEREFORE, your deponent respectfully requests that the defendant ERNEST AMPONSAH be dealt with according to law.



GERARD MAMAHON
Special Agent
Immigration and
Customs Enforcement

Sworn to before me this
17th day of January, 2010



UNITED STATES JUDGE
EASTERN DISTRICT OF NEW YORK